

STOKES BACON

ATTORNEY RATE: 14.7 HR @ 350/HR = 5145 WITH REDUCED HOURS INCLUDED

PARALEGAL RATE: 3@150/HR - 440

AMOUNT REQUEST: 12.5@ 350/HR = 4375 (EVEN LESS THAN TIME ALREADY REDUCED)

		MOTION TO DISMISS FOR FAILURE TO MAKE PAYMENTS #1 TOTAL TIME: .7 @ 350/HR = \$245 “*” REDUCED TIME	
10/30/18	MVL	<ul style="list-style-type: none"> LETTER D RE MOTION TO DISMISS CASE FOR FAILURE TO MAKE PLAN PAYMENTS; HEARING DATE 11/28; OPTIONS IF CASE GET DISMISSED; HIGHLIGHT MISSED PAYMENTS; STATUS OF MORTGAGE PAYMENTS; CHECK TRUSTEE HISTORY (AKA NDC) EMAIL D RE HEARING DATE; NDC HISTORY, STATUS OF MORTGAGE PAYMENTS; 	.2
10/30/18	CF	MAIL LETTER	N/C
10/31/18	MVL	T/C D RE PAYMENTS, RECEIVED EMAIL BUT NOT LETTER; SHOULD HAVE 2K NEXT WEEK; ADV. MISSED AUG/SEPT; SHE UNDERSTOOD	.2
11/5/18	MVL	T/C D RE PAYMENTS; SAYS SENT PAYMENT; ADV. SEND PROOF	.1*
11/6/18	MVL	EMAIL D – PAYMENT POSTED; CHECK NDC REQUEST TRUSTEE MOTION BE W/DRAWN	.1
11/27/18	MVL	CONFIRM FR TRUSTEE, MOTION W/DRAWN; EMAIL D: MOTION WITHDRAWN; SENDING LATEST NDC FOR RECORDS; KEEP MAKING PAYMENTS; AND PLEASE LET KNOW AHEAD OF TIME IF FALL BEHIND	.1
		MOTION TO DISMISS FOR FAILURE TO MAKE PAYMENTS #2 TOTAL TIME: .8 @ 350/HR = \$280	

		“*” REDUCED TIME	
10/2/20	MVL	<ul style="list-style-type: none"> • LETTER D RE MOTION TO DISMISS CASE FOR FAILURE TO MAKE PLAN PAYMENTS; HEARING DATE 11/4; HIGHLIGHT MISSING PAYMENTS & OPTIONS IF CANNOT AFFORD BK • CHECK NDC, PAYMENT SPORADIC • EMAIL D RE NDC HISTORY ATTACHED, HEARING DATE 	.2*
10/2/20	JC	MAIL MVL LETTER; ADD DATE TO CALENDAR	N/C
10/8/20	MVL	T/C D RE ISSUE W. WORK; WILL TRY TO PAY IN FULL BEFORE END MONTH	.1
10/11/20	MVL	EMAIL FR D RE BORROWING MONEY; EMAIL D: FROM A PERSON, BANK OR RETIREMENT? EMAIL FR. D: FROM FRIEND EMAIL D: OK, ARE YOU GOING TO HAVE TO PAY THIS BACK? EMAIL FR. D: YES EMAIL D: CAN YOU AFFORD THAT, YOU PROBABLY SHOULD JUST AMEND THE PLAN OR REFILE EMAIL FR D: NO, I CAN. I DON'T WANT TO REFILE EMAIL D: OK, SEND ME PROOF	.1*
10/25/20	MVL	EMAIL FR D: OK, I HAVE THE MONEY EMAIL D: OK, I NEED PROOF EMAIL FR D: OK, NEEDS TO CLEAR MY ACCOUNT THEN WILL SEND PROOF EMAIL D: OK. HEARING IS THIS WEEK. EMAIL FR D: OK I WILL, THANK YOU SO MUCH MICHELLE EMAIL D: NO PROBLEM	.1*
11/03/20	MVL	<ul style="list-style-type: none"> • CHECK NDC SITE; D PAID IN FULL; • CONTACT TRUSTEE, REQUEST W/DRAW (GRANTED); EMAIL D: OK, MTD WITHDRAWN, BUT AGAIN, YOU NEED TO MAKE PAYMENTS ON TIME EMAIL FR D: I AM TRYING MICHELLE. EMAIL D: OK, YOU MIGHT NEED TO GO ON WAGE ORDER OR SOMETHING, BECAUSE THIS IS 2 ND MOTION TO DISMISS EMAIL FR D: I KNOW. I KNOW. LIKE I SAID, ALL I CAN DO IS TRY ESPECIALLY WITH COVID STUFF.	.3*

		EMAIL D: OK, JUST LET ME KNOW AHEAD OF TIME. BECAUSE AGAIN, WE MAY NEED TO DISCUSS OTHER OPTIONS HERE. TWO MOTIONS ISN'T GOOD EMAIL FR D: OK. I KNOW. THANK YOU.	
		MOTION TO DISMISS FOR FAILURE TO MAKE PAYMENTS #3 TOTAL TIME: .9 @ 350/HR = \$315 TOTAL TIME PARALEGAL: .3 @ \$150 = \$45 “*” REDUCED TIME	
3/25/21	MVL	EMAIL D: TRUSTEE FILED ANOTHER MTD, THIS IS 3 RD ONE, WHAT'S GOING ON EMAIL FR D: I KNOW, I'M BEHIND ON MY MORTGAGE EMAIL D: THEN YOU REALLY SHOULD PROBABLY REFILE AT THIS POINT; IS IT COVID RELATED? EMAIL FR D: EVERYTHING IS TOO MUCH MICHELLE EMAIL D: WHATS TOO MUCH. YOUR TRUSTEE PAYMENT? MORTGAGE PAYMENT? SEND ME YOUR PAYSTUBS AND ILL SEND YOU SCHEDULE I TO REVIEW; B/C ON PAPER, YOU SHOULDN'T BE AT 3 RD IN LESS THAN A YEAR EMAIL FR D: I KNOW. I'M BEHIND ON MORTGAGE BUT WILL CATCH UP I HOPE WITH MY TAX REFUND EMAIL D: WELL WHEN DOES THAT COME EMAIL FR D: ALREADY FILED EMAIL D: HAVE YOU APPLIED FOR COVID FORBEARANCE? EMAIL FR D: NO, WHAT'S THAT EMAIL D: IF IMPACTED BY COVID, YOU CAN STOP PAYMENT FOR LIKE 6 MONTHS & THEY THEN MAY REVIEW YOU FOR LOAN MOD EMAIL FR D: HOW DO I GET THAT EMAIL D: CALL LENDER; ILL HAVE JEN SEND YOU AUTHORIZATION LETTER; SHOULD BE PRETTY EASY, YOU JUST CALL EMAIL FR D: OK, ILL CALL THEM EMAIL D: WELL, THEY MAY NOT TALK TO YOU W/O AUTHORIZATION LETTER, SO NEED THAT 1 ST ; EMAIL JCARLSON@MARGOLISEDELSTIEN.COM FOR IT; YOU NEED TO GIVE HER MORTGAGE AUTH # & WHERE TO FAX; EMAIL FR D: OK. I'M GOING TO DO THAT & STILL TRY TO CATCH UP W. TAX RETURN	.3* .1

		<p>EMAIL D: OK, WELL YOU STILL ALSO NEED TO GET CAUGHT UP W. TRUSTEE PAYMENT. SO EITHER SAVE THE REFUND, MODIFY PLAN & LETS SEE WHAT MORTGAGE CO SAYS RE COVID FORBEARANCE; GET BACK TO ME</p> <p>EMAIL FR D: THANK YOU SO MUCH MICHELLE. YES. I WILL</p> <p>EMAIL FR D: MICHELLE, THE EMAIL BOUNCED BACK</p> <p>EMAIL D: MY BAD, TRY JCARLSON@MARGOLISEDELSTEIN.COM. SPOKE W/JEN, SHE KNOWS. SHE ALREADY DRAFTED IT & GOT MORTGAGE ACCT # FROM SCHEDULES. TOLD HER TO GIVE IT TO YOU & YOU CAN SEND IT WHEREVER</p> <p>EMAIL FR D: OK</p> <p>CHECK NDC</p>	
3/25/21	JC	PREPARE & FORWARD MORTGAGE AUTHORIZATION LETTER	.1
3/28/21	MVL	<p>EMAIL D: ANY UPDATE FROM MORTGAGE?</p> <p>EMAIL FR D: I DIDN'T DO IT.</p> <p>EMAIL D: WELL, WHY? YOU HAVE THE MOTION TO DISMISS AND BEHIND ON MORTGAGE. IF MORTGAGE COMPANY FILES RELIEF, THEY CHARGE YOU AT LEAST 1300-1400 PLUS ARREARS</p> <p>EMAIL FR D: OH. DOES TRUSTEE CHARGE ME TOO</p> <p>EMAIL D: NO.</p> <p>EMAIL FR D: OK, WELL, I FILED MY RETURN & I SHOULD HAVE ENOUGH TO COVER BOTH IN 2 WEEKS</p> <p>EMAIL D: OK. BUT WHAT HAPPENS AFTER YOU SPEND THE RETURN? YOU STILL NEED TO BE ABLE TO AFFORD EVERYTHING</p> <p>EMAIL FR D: NOT SURE, BUT I'M GOING TO PRAY ABOUT IT.</p> <p>EMAIL D: OK.</p> <p>EMAIL FR D: MICHELLE, I JUST NEED 2 WEEKS. CAN YOU PLEASE GET THAT FOR ME.</p> <p>EMAIL D: OK, ILL KEEP EYE OUT, LET ME KNOW WHEN MAKE PAYMENT</p>	.1*
4/3/21	MVL	<p>EMAIL FR D: HI, I HAVE MY PAYMENT & WILL SEND A CHECK</p> <p>EMAIL D: NO, IT HAS TO BE MO OR TFS. YOU ARE ALREADY ON TFS AREN'T YOU?</p> <p>EMAIL FR D: YES, BUT I'M HAVING ISSUES WITH IT</p> <p>EMAIL D: HMM. MAYBE B/C OF THE MOTION. I'M NOT SURE, I CAN GET JEN TO CALL. HOW MUCH DOYOU HAVE? I STILL NEED PROOF. HEARING COMING UP.</p>	.1*

		EMAIL FR D: 500. ILL HAVE 1500 IN 2 WEEK. EMAIL D: OK, SEND ME PROOF	
4/3/24	JC	CALL TFS. EMAIL MVL: D SHOULD BE ABLE TO MAKE PAYMENT EMAIL FR MVL: OK, LET D KNOW PLZ EMAIL MVL: WILL DO BOSS! EMAIL FR MVL: THANKS	.2
4/3/24	JC	LEFT V/M D – CAN PAY THROUGH TFS	N/C
4/5/21	MVL	EMAIL D: RECEIVED PROOF OF \$500 EMAIL FR D: OK, ILL HAVE OTHER 1500 IN 2 WEEKS EMAIL D: YES, BUT REMEMBER, NEW PAYMENTS POST EACH MONTH; ILL NEED TO CHECK TO SEE IF THAT WILL MAKE YOU CURRENT EMAIL FR D: IT SHOULD EMAIL D: OK, AND THIS IS TAX REFUND MONEY? EMAIL FR D: YES. EMAIL D: AND YOU CAUGHT UP ON MORTGAGE EMAIL FR D: YUP, WILL BE. I'M SO SORRY MICHELLE. I REALLY AM TRYING. TELL THE TRUSTEE SORRY TO. EMAIL D: I KNOW YOU ARE. I JUST REALLY NEED YOU TO LET ME KNOW BEFORE TRUSTEE FILES MOTION. AND I STILL SAY, YOU SHOULD SAVE THIS MONEY AND REFILE. YOU STILL AHVEN'T EVEN APPLIED FOR COVID FORBEARANCE & THEY MAY GIVE YOU A MOD EMAIL FR D: I KNOW MICHELLE. I KNOW. I WILL. I'M GOIN DO BETTER EMAIL D: OK, ONCE YOU SEND ME THE 1500, I'LL CONFIRM IT POST & THEN CONTACT TRUSTEE EMAIL FR D: OK	.1*
4/13/21	MVL	EMAIL FR D: HI MICHELLE, HERE IS PROOF OF 1500 EMAIL D: OK, WHEN IT GETS CLOSE TO MOTION, I'LL CONFIRM IT POSTS & THEN REACH OUT TO TRUSTEE EMAIL FR D: THANKS	.1
4/20/21	MVL	CHECK NDC; PAYMENT POSTED, REQUEST MTD TO BE WITHDRAWN EMAIL D: MOTION WITHDRAWN EMAIL FR D: THANK YOU THANK YOU EMAIL D: NO WORRIES. I NEED YOU TO STAY CURRENT OR GO ON WAGE ORDER. YOU NEVER DID SEND ME THAT UPDATED J/I EMAIL FR D: WHAT'S THAT? EMAIL D: J – EXPENSES; I – INCOME; YOUR SCHEDULES, ILL RESEND; THIS 3 RD ONE	.1*

		MOTION TO DISMISS FOR FAILURE TO MAKE PAYMENTS #4 TOTAL TIME: 2.2 @ 350/HR = \$770 TOTAL TIME PARALEGAL: .5 @ \$150 = \$75 “*” REDUCED TIME	
9/23/21	MVL	<ul style="list-style-type: none"> • 4TH MOTION TO DISMISS FOR FAILURE TO PAY; • CHECKED DOCKET, NO MFR • CHECKED NDC <p>EMAIL D: 4TH MTD! I REVIEWED PAYMENT HISTORY (SEE ATTACHED) AND IMMEDIATELY DEFAULTED ON PAYMENTS. THANKFULLY, LENDER HAS NOT FILED A MFR – ARE YOU CURRENT WITH MORTGAGE AT LEAST? WHAT IS GOING ON HERE. I STILL HAVE NOT RECEIVED ANYTHING ABOUT INCOME OR EXPENSES</p> <p>EMAIL FR D: CAN I CALL YOU</p> <p>EMAIL D: YES, TOMORROW, ILL HAVE JEN SCH TIME; BUT AT THIS POINT, I DON'T SEE HOW I CAN NOT FILE W WAGE ORDER HERE</p> <p>EMAIL FR D: I KNOW MICHELLE. I'M SO SO SORRY. PLEASE DON'T BE MADE AT ME</p> <p>EMAIL D: I'M NOT MAD. BUT I REALLY NEED TO KNOW WHAT IS GOING ON HERE, B/C 2 IN 1 YEAR, TRUSTEE GOING TO NOT BE HAPPY, EVEN IF YOU CATCH UP.</p> <p>EMAIL FR D: I KNOW. I'M SO SO SORRY.</p> <p>EMAIL D: ILL HAVE JEN SCH APPTY, I DON'T HAVE MY CALENDAR IN FRONT OF ME RT NOW & I CANT TALK TODAY. I HAVE VET APPTY & WILL BE OUT REST OF TODAY</p> <p>EMAIL FR. D: OK, I UNDERSTAND</p>	.2
9/23/21	JC	<p>EMAIL FR MVL: JEN, PLZ SCH APPTY FOR D, BOOK ½ HR, I HAVE FEELING SHE IS GOING TO CRY</p> <p>EMAIL MVL: WILL DO</p> <p>T/C D: SCH APPTY FOR 9/24</p> <p>EMAIL MVL: YUP, SHE WAS CRYING.</p> <p>EMAIL FR MVL: HOW BAD. I CANT SQUEEZE HER IN TODAY, WHEN APPTY?</p> <p>EMAIL MVL: TMW. WAS PRETTY BAD.</p> <p>EMAIL FR MVL: BOOK IT FOR HR THEN. ILL NEED HER TO CALM DOWN</p> <p>EMAIL MVL: OK, MOVED TO 9/25.</p> <p>EMAIL FR MVL: OK, THANKS</p>	.2

		T/C D: RESCHEDULE TO 9/25. STILL CRYING. TOLD HER EVERYTHING WILL BE OK.	
9/25/21	MVL	T/C D RE 4 TH MTD; NEED WAGE ORDER; WILL LET ME KNOW IF CAN BORROW/PAY TO CURE. CALMED DOWN QUICKLY. WILL SEND ME EMAIL THAT SHE UNDERSTOOD WHAT WE DISCUSSED	.2*
10/5/21	MVL	CHECK NDC EMAIL D: I CHECKED NDC BUT DIDN'T SEE ANY PAYMENTS. SO, WERE YOU ABLE TO BORROW MONEY? EMAIL FR D: WORKING ON IT EMAIL D: OK, WELL LET ME KNOW ASAP	.1
10/15/21	MVL	CHECK NDC EMAIL D: CHECKED NDC AGAIN, STILL NO PAYMENT; PLEASE CONTACT THE OFFICE	.1
10/16/21	MVL	V/M D – DOESN'T HAVE IT; BEHIND MORTGAGE	.1
10/16/21	MVL	EMAIL D RE MSG; PLEASE CALL	.1
10/18/21	MVL	T/C D RE BEHIND ON MORTGAGE & TRUSTEE PAYMENTS. DOES NOT HAVE MONEY TO GET CAUGHT UP ON EITHER. TRYING TO BORROW MONEY FROM FRIEND. ADV THAT CAN REFILE, BETTER TO REFILE THAN GET MFR. AND AGAIN, NEED TO JUST APPLY FOR COVID FORBEARANCE. ADV NOTHING ELSE I CAN DO HERE, IF SHE DOESN'T PAY, DOESN'T SEEK AID, DOESN'T REFILE. AT SOME PT, THE CREDITORS/TRUSTEE WILL MAKE THAT DECISION FOR HER; STARTED CRYING, TOLD HER TO GET BACK TO ME ONCE SHE CALMS DOWN. STILL NOT CLEAR WHY BEHIND	.1*
10/31/21	MVL	V/M D WILL HAVE 2K NEXT WEEK	N/C
11/2/21	MVL	EMAIL FR D: GOING TO SEND 2250 EMAIL TRUSTEE RE REQUEST CONTINUANCE; 2250 COMING	.1
11/03/21	MVL	EMAIL FR TRUSTEE: CONFIRM CONT'D; EMAIL FR D: SENT 2250, HOW MUCH DO I OWE? EMAIL D: LET ME CHECK NDC CHECK NDC & FORWARD TO D; DO THE MATH	.2

11/10/21	MVL	CHECK NDC; CONFIRM \$2250 RECEIVED BY TRUSTEE BUT STILL ARREARS; EMAIL D ARREARS EMAIL FR D: I DON'T HAVE THAT EMAIL D: IT WILL KEEPBUILDING IF YOU DON'T GET CAUGHT UP IN FULL EACH MONTH EMAIL FR D: SO WHAT DO I DO EMAIL D: AGAIN, YOU NEED TO EITHER MODIFY OR DISMISS EMAIL FR D: BUT I CANT RESTART, I'VE BEEN SINCE 2018 AND MY CREDIT GOT GOOD EMAIL D: WELL, CREDIT LAST THING YOU NEED TO BE THINKGIN ABOUT; YOU ARE BEHIND ON MORTGAGE AND TRUSTEE. I'M STILL SURPRISED MORTGAGE HASN'T FILED A MFR YET HONESTLY EMAIL FR D: I DON'T KNOW. WHAT DO I DO. I DON'T WANT TO REFILE EMAIL D: WELL, THEN YOU NEED TO COME UP WITH THE MONEY OR AGAIN AMEND PLAN. BUT IF YOU CANT AFFORD OLD PLAN, HOW YOU GONNA AFFORD NEW PLAN. AND YOU STILL HAVEN'T SENT ME EXPENSES, B/C YOU SHOULD BE ABLE TO AFFORD EVERYTHING	.2*
11/29/21	MVL	EMAIL D RE HEARING 12/1; NEED UPDATE B/C NO PAYMENT SINCE 11/8	.1*
11/29/21	MVL	T/C D RE NEED FEW DAYS FOR PAYMENT; LIKELY NEED MTMP; LOOKING FOR ALTERNATE EMPLOYMENT; EMAIL TRUSTEE RE CONT	.3* N/C
12/1/21	MVL	FORWARD NEW DATE TO D; EMAIL FR D: PAYMENT SCH FOR 12/9 EMAIL D: NEED PROOF. HOW MUCH EMAIL FR D: 250 EMAIL D: ADV NOT ENOUGH. ALREADY RECEIVED CONTINUANCE PLUS THIS IS 4 TH . WHAT'S UPDATE ON EMPLOYMENT SITUATION? EMAIL FR D: NOT GOOD, THIS JOB HAS ME TOO STRESSED OUT, I NEED TO GO SOMEWHERE ELSE EMAIL D: YES, BUT YOU NEED INCM EMAIL FR D: YES. EMAIL D: AND 250 NOT ENOUGH	.1*
12/15/21	JC	EMAIL MVL: YO, MVLEE, BACON CALLED CRYING AGAIN. YOU WANT AN APPOINTMENT?	.1*

		EMAIL FR MVL: NO. SHE NEED TO MODIFY OR DISMISS. 250 NOT ENOUGH EMAIL MVL: SHOULD I ASK FOR CONTINUANCE? EMAIL FR MVL: NO, TOO EARLY EMAIL MVL: OK BOSS	
1/12/22	MVL	MTD TO BE CONTINUED VM D APPLIED FOR COVID FORBEARANCE	.1
1/12/22	JC	EMAIL MVL: YO BOSS, BACON TOTALLY SPAZED OUT CRYING. SCHEDULE APPTY? EMAIL FR MVL: NOTHING MORE I CAN SAY TO HER AT THIS PT, SO NO; EMAIL MVL: SO WHAT TO DO? EMAIL FR MVL: THAT NEEDS TO FILE MTMP OR DISMISS. NO MORE CONTINUANCES, THIS IS IT. I'M WASTING TOO MUCH TIME HERE. EMAIL MVL: GOT IT!	.1*
2/27/22	JC	T/C D RE NEED TO SPEAK W. MVL RT AWAY EMAIL MVL: D NEED SPEAK W YOU RT AWAY EMAIL FR MVL: FOR WHAT? EMAIL MVL: ILL CALL HER T/C D: NEED TO SPEAK W MVL B/C [REDACTED] [REDACTED] EMAIL MVL: [REDACTED] [REDACTED] EMAIL FR MVL: SHEESH, OK, SET ASIDE AN HR FOR HER; BASED ON HER CONDITION IF SHE CAN, SEE IF SHE PREFERS IN PERSON/VIDEO OR PHONE T/C D: SET APPTY 3/1, 1 HR; TOLD HER IT WILL BE OK & KEEP HER IN PRAYERS.	.3*
		MOTION TO MODIFY PLAN #1 ATTORNEY TIME: 2.5 @ 350 = \$875 (*) = REDUCED REDACTED FOR MEDICAL HEALTH REASONS	
3/01/22	MVL	PREPARE MOTION TO MODIFY PLAN; DRAFT AMENDED PLAN; T/C D RE PLAN & [REDACTED] [REDACTED]	1*

		<p>[REDACTED]</p> <p>EMAIL TRUSTEE TO REQUEST CONTINUANCE, EVEN THOUGH NO PAYMENTS</p>	
3/30/22	MVL	EMAIL RE MTD	.1
4/04/22	MVL	<p>PREPARE AMENDED PLAN; MTMP CONT'D 4/27 NO PAYMENT T/C D RE NO PAYMENT, MTMP CONT'D TO 4/27, EXPLAIN AMENDED PLAN, DISCUSSED [REDACTED]</p>	.4
04/11/22	MVL	<p>AMEND I/J; REVIEW W. SCHEDULES W. D; DISCUSSED [REDACTED];</p>	.3
04/27/22	MVL	<p>MTMP/MTD CONTINUED 5/25 NO PAYMENT</p>	N/C
5/6/22	MVL	CHECK NDC	N/C
5/6/22	JC	<p>EMAIL MVL: [REDACTED] [REDACTED] ? [REDACTED] EMAIL FR MVL: [REDACTED] [REDACTED]</p>	N/C
05/25/22	MVL	<p>PREPARE & FILE AMENDED PLAN; MTMP/MTD CONT'D T/C D RE: [REDACTED] [REDACTED] [REDACTED] STRESS IS TOO MUCH; LET'S JUST LET CASE GET DISMISSED AND REFILE</p>	.4
06/07/22	MVL	<p>EMAIL TRUSTEE RE MTMP FILED CNR EMAIL D: CHECKING UP ON YOU EMAIL FR D: YES, I'M [REDACTED] EMAIL D: GREAT. DID THE [REDACTED] EMAIL FR D: NOT YET EMAIL D: OK. I FILED A CNR TO THE MTMP. SHOULD E APPROVED</p>	.3

		<p>EMAIL FR D: THAT'S GREAT. [REDACTED]</p> <p>[REDACTED]</p> <p>EMAIL D: NOT TO STRESS YOU OUT FURTHER, BUT I JUST RECEIVED A NOTICE ABOUT DEFAULT OF MORTGAGE MORTGAGE</p> <p>EMAIL FR D: I CANT RT NOW.</p> <p>EMAIL D: I KNOW. [REDACTED]</p> <p>[REDACTED]</p>	
		<p>CERTIFICATE OF DEFAULT & MOTION TO MODIFY PLAN #2</p> <p>ATTORNEY TIME: 7.6 @350 = \$2660</p> <p>PARALEGAL TIME: .5 @150 = \$75</p> <p>“*” = REDUCED TIME</p> <p>SECTIONS REDACTED RELATED TO MEDICAL REASONS</p>	
06/14/22	MVL	<p>REVIEW COD;</p> <p>EMAIL D: DON'T WANT YOU TO PANIC PLEASE, AND IF YOU NEED AN APPOINTMENT, LET ME KNOW; BUT LENDER FILED SOMETHING CALLED A CERTIFICATE OF DEFAULT. THAT MEANS THAT THEY WANT RELIEF FROM THE BK TO PROCEED TO FORECLOSURE B/C OF THE NOTICE THAT I SENT YOU</p> <p>EMAIL FR D: OH MY GOD OH MY GOD</p> <p>EMAIL D: IM GOING TO CALL YOU.</p> <p>EMAIL D: I JUST TRIED CALLING. WILL CALL AGAIN, I NEED YOU TO PICK UP</p> <p>EMAIL FR D: OK</p> <p>T/C D: [REDACTED]</p> <p>[REDACTED]</p> <p>PREPARE & FILE OBJECTION TO COD</p> <p>EMAIL MOYER RE REQUEST PAYMENT HISTORY</p>	.4*
6/14/22	JC	<p>EMAIL FR MVL: [REDACTED]</p> <p>[REDACTED]</p> <p>EMAIL MVL: [REDACTED]</p>	N/C
6/17/22	MVL	<p>EMAIL D: RE NEED PROOF OF PAYMENTS, HEARING DATE IS 7/20. AND WE ALREADY KNOW THAT YOUR</p>	.1* .1

		<p>HISTORY IS SPORADIC, SO YOU MAY HAVE TO GO BACK TO THE TIME THE STIP WAS ENTERED.</p> <p>EMAIL FR D: OK, SO HOW DO I GET THAT? B/C I DON'T KNOW WHEN I MADE PAYMENTS AND WHEN I DIDN'T, AND I CANT HANDLE ANYTHING ELSE MICHELLE. I SEE MY DOCTOR TOMORROW.</p> <p>EMAIL D: YES, WELL, SEE WHAT YOU CAN GET ME, I WANT TO GO BACK TO AT LEAST 2019 IF POSSIBLE; YOU PROBABLY HAVE TO PAY FOR THAT; YOU GIVE ME THE INFO & THEN I'LL PUT INTO A SHEET. AT END OF THE DAY, THE MATH IS THE MATH & WE BOTH KNOW YOU OWE SOMETHING. BASED ON YOUR</p> <p>[REDACTED]</p> <p>EMAIL FR D: YES</p> <p>EMAIL MOYER: WHEN WILL I BE GETTING MY HISTORY?</p> <p>EMAIL FR MOYER: WORKIN ON IT</p> <p>EMAIL MOYER: OK THANKS. I EXPECT BANK STATEMENTS FROM CLIENT TMW</p>	
6/19/22	JC	<p>EMAIL MVL: SOMEONE FOR BACON DROPPED OFF STACK OF BANK STATEMENTS. THIS FOR THE COD RIGHT? I'LL SCAN THEM OVER TO YOU; SHOLD I SEND TO MOYER?</p> <p>EMAIL FR MVL: THANKS. NO, I NEED TO SEE THEM FIRST. B/C I DON'T WANT [REDACTED]</p> <p>[REDACTED]</p>	N/C
6/20/22	MVL	<p>RECEIVE BANK STATEMENTS FROM D; PUT PAYMENTS INTO SPREAD SHEET;</p> <p>EMAIL D: RECEIVED STATEMENTS & ORGANIZED ALL THE PAYMENT. JUST TO CONFIRM, THIS ONLY ACCONT RIGHT?</p> <p>EMAIL FR D: YES</p> <p>EMAIL D: OK.</p> <p>EMAIL MOYER: DEAREST LAUREN, STILL LOOKING FOR THAT PAYMENT HISTORY</p> <p>EMAIL FR MOYER: I KNOW RIGHT!</p> <p>EMAIL MOYER: I WENT THROUGH D'S BANK STATEMENTS; SEVERAL LUMP SUM PAYMENTS, BUT DEF SHORTAGE</p> <p>EMAIL FR MOYER: CAN SHE CURE?</p>	.9* .1

		EMAIL MOYER: WELL, LET ME SEE YOUR #S 1ST	
7/12/22	JC	T/C D: WILL LET MVL KNOW THAT HAVE A PAYMENT; LET HER KNOW LAST TIME I SPOKE W. MVL, SHE WAS STILL WAITING FOR PAYMENT HISTORY; GLAD SHE IS DOING BETTER, SOUNDS BETTER;	.1
07/19/22	MVL	EMAIL MOYER: REVIEWED HISTORY; CAN WE PLEASE CONT COD HEARING? EMAIL FR MOYER: SURE	.1
7/19/22	JC	T/C D: PER MVL, COD HEARING CONT'D. SHE WILL SEE IF THEY WILL AMEND PLAN FOR ARREARS, BUT SHE NEEDS TO KNOW IF HAVE ANYMORE MONEY? D WILL GET BACK TO ME	.1
7/19/22	DM	PER MVL: TRANSFER FROM JEN TO ME TO F/UP W PAYMENTS; JEN KEEPS CRYING W. D; CALLED D TO INTRODUCE MYSELF & SEND FUTURE PAYMENTS TO ME	.1
8/5/22	DM	FORWARD PAYMENT PROOF TO MVL/MOYER	N/C
8/10/22	DM	T/C D RE COD STATUS, ADV THAT MVL WILL TRY TO SETTLE; LAUREN IS A NICE ATTY; AND NOT TO PANIC. AND MVL ON VACATION	.1
8/17/22	DM	T/C D RE LET HER KNOW MVL NO GETTING BACK UNTIL NEXT WEEK; PER LAST INSTRUCTIONS FROM MVL, TO KEEP BK PAYMENTS UP TO DATE & SEND IN AS MUCH MONEY AS POSSIBLE SO THEY WILL AGREE TO A STIP; THIS JUDGE DOESN'T GIVE 2 ND CHANCES, ONLY LENDER CAN	.1*
8/17/22	DM	EMAIL GM: GEORGETTE, MICHELLE ON VACATION AND HER CLIENT STARTED CRYING. PER JEN, THIS CLIENT IS [REDACTED] E. CAN YOU PLEASE TALK W. HER. [REDACTED] EMAIL FR GM: HER NUMBER IN BC? EMAIL GM: YES EMAIL FR GM: WILL CALL HER. NOTE THE FILE. EMAIL GM: WILL DO	N/C
8/18/22	DM	SENT PROOF OF PAYMENT TO LENDER ATTY; REQUESTED STIPULATION IF POSSIBLE PER NOTES FROM MVL	.1

8/24/22	DM	T/C MVL: TOLD HER TO CHECK NOTES RE 8/17 CALL; [REDACTED] FMLA; SHE WILL REACH OUT TO LAUREN TO SEE IF WILL AGREE TO STIP B/C OF D CONDITION	.1*
08/24/22	MVL	T/C MOYER RE SETTling COD; EMAIL MOYER RE CONFIRM SETTLE COD; LENDER WILL AGREE TO AP FOR ARREARS: STIP TBF	.2
9/10/22	MVL	FINAL REVIEW STIP W. DEBTOR; RECEIPT UPDATED HISTORY; CONFIRM ALL PAYMENTS POSTED	.3
9/13/22	MVL	EMAIL DM RE CONTACT D TO AMEND PLAN	.1
9/13/22	DM	LEFT V/M D RE NEED APPTY W. MVL	N/C
10/26/22	MVL	EMAIL FR MOYER: ANY UPDATE ON AP EMAIL MOYER: WILL LET YOU KNOW; WILL REACH OUT TO CLIENT; SHE ISN'T WELL EMAIL D RE NEED MTMP ASAP	.1
11/8/22	MVL	EMAIL FR MOYER RE MTMP STATUS EMAIL D RE MTMP NEEDED LETTER TO D RE MTMP, PLEASE CALL	.1 .1
11/8/22	DM	EMAIL MVL: YOU THINK [REDACTED] EMAIL FR MVL: SURE HOPE NOT	N/C
11/28/22	MVL	DRAFT AP, EMAIL TO D; PLEASE REVIEW; NEED TO FILE MTMP	.4
12/15/22	MVL	EMAIL DM: SEND LETTER D RE AP; FINAL NOTICE	N/C*
12/15/22	DM	PREPARE & SEND FINAL NOTICE LETTER	.1
12/29/22	MVL	V/M D RE FINAL NOTICE;	N/C*
1/17/23	MVL	EMAIL FR MOYER: HI MICHELLE, CLIENT WANTS TO KNOW STATUS OF MTMP EMAIL MOYER: HAVEN'T HEARD FROM D	.1
1/18/23	MVL	EMAIL EX DORIS RE CONTACTING D; LEFT V/M; SENT LETTER AGAIN YESTERDAY	.2
2/13/23	MVL	EMAIL EX MOYER; LENDER SENDING NOTICE OF DEFAULT; TOLD GO AHEAD	.1

2/14/23	MVL	UPDATE AMENDED PLAN; CHECK NDC EMAIL D: DORIS SAYS LEFT V/M; NEED TO CALL ME; EMAIL FR D: SORRY [REDACTED] [REDACTED] CAN I CALL YOU EMAIL D: YES EMAIL MOYER: HEARD FROM D. I SENT HER UPDATED AP	.5
2/21/23	MVL	EMAIL D: OK DIANA, AFTER OUR DISCUSSION, YOU SAID YOU'D SEND ME UPDATED INCOME TO SEE IF YOU CAN AFFORD THIS PLAN. I SENT YOU THE PROPOSED PLAN. CAN YOU PAY IT? I DON'T WANT TO SET YOU UP FOR FAILURE EMAIL FR D: CAN I CALL EMAIL D: YES, BUT STILL NEED TO KNOW	.1
3/1/23	DM	PER MVL; SCH APPTY FOR D B/C SHE DIDN'T CALL HER AS ASKED ON 2/21. APPTY SCHEDULED OFR 3/3; MVL SAYS BOOK FOR ½	N/C
3/3/23	MVL	T/C D RE MEDICAL SITUATION RELATED TO [REDACTED] [REDACTED] [REDACTED] DECLINE INCOME; MAY DISMISS CASE [REDACTED] ADVISED IF THAT'S THE CASE, LET'S TRY NEW AP WHERE DO STEPS	.3*
3/6/23	MVL	T/C D RE AMEND PLAN BASED ON 3/3 CALL; SAYS CAN AFFORD NEW PROPOSED PLAN; GETTING OF FMLA PREPARE MTMP; AMEND PLAN; RUN NUMBERS TO SEE IF BETTER TO STAY IN THIS CASE OR REFILE, BUT POTENTIAL EQUITY IN PROPERTY NOW;	.3 .5 .3
3/6/23	DM	FILE MTMP PLAN	.1
3/23/23	MVL	EMAIL SWARTZ RE STATUS; CHECK NDC/PREPARE FOR HEARING	.1
3/27/23	DM	PER D: NEEDS CALL AT AFTER 9PM B/C NOW LIVING OVERSEAS. FYI SOUNDED IN MUCH BETTER PER MVL: OK	N/C
3/28/23	MVL	AMEND I/J;	1*

		T/C D RE INCOME/EXPENSES; HEALTH; DIVORCE; MOVED OVERSEAS;	
4/1/23	MVL	CHECK W. TRUSTEE; MTMP OK	.1
	MVL	FEE APPLICATION	1*

ATTORNEY RATE: 14.7 HR @ 350/HR = 5145 WITH REDUCED HOURS INCLUDED

PARALEGAL RATE: 3@150/HR - 440

AMOUNT REQUEST: 12.5@ 350/HR = 4375 (EVEN LESS THAN TIME ALREADY REDUCED)